

EXHIBIT I

Brendan H. Little

From: jhilton@hiltonparker.com
Sent: Thursday, May 28, 2020 10:24 AM
To: ConsumerFiling@adr.org; Brendan H. Little
Subject: RE: Solicity Manley v. Diversified Recovery Bureau, LLC - Case 01-20-0004-9270
Attachments: AAA - Response re Solicity Manley.pdf

Dear AAA:

Please find attached my firm's response. Please note that pursuant to AAA rules, this case has already been refiled in the Western District of New York, Case No. 1:20-cv-551.

Jonathan L. Hilton
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Pickerington, OH 43147
www.hiltonparker.com

From: ConsumerFiling@adr.org
Sent: Thursday, May 21, 2020 5:10 PM
To: jhilton@hiltonparker.com; blittle@lippes.com
Subject: Solicity Manley v. Diversified Recovery Bureau, LLC - Case 01-20-0004-9270

Hello,

Please review the attached correspondence regarding the above-referenced case.

Feel free to contact me with any questions, comments or concerns you have related to this matter.

Thank you.



Consumer Case Filing Team

1101 Laurel Oak Road
Suite 100, Voorhees, NJ 08043
E: ConsumerFiling@adr.org



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HILTON PARKER LLC



American Arbitration Association
1101 Laurel Oak Road
Vorhees, NJ 08043

March 27, 2020

Case Number: 01-20-0004-9270

Consumer Filing Team:

My firm represents Solicity Manley. This case was originally filed in the United States District Court for the Western District of New York on October 15, 2019 (Case No. 1:19-cv-1395.) Defendant Diversified Recovery Bureau, LLC defaulted in that case on November 21, 2019. After my client agreed to set aside the default, Defendant filed a motion to dismiss the Complaint on December 5, 2019. The Court denied the motion to dismiss as moot on January 8, 2020, and on February 10, 2020, Defendant moved to compel arbitration. Plaintiff then voluntarily stipulated to dismissal of the Complaint in order to pursue arbitration.

After the AAA dismissed the arbitration proceeding, my client refiled the case in federal court on May 8, 2020 (Case No. 1:20-cv-551). On May 8, 2020, I also requested that Defendant advise whether it would waive formal service. Thus far, we have received no response.

Enough is enough. Arbitration is supposed to provide a faster and less costly method of resolving disputes. The actions taken by Defendant in this matter—which include defaulting; filing a motion to arbitrate almost five months after the Complaint was filed; failing to ensure that the AAA would accept the dispute for arbitration; and failing to promptly waive service in the subsequent court case—demonstrate a clear record of delay designed to frustrate the progress of this matter. My client has now elected to pursue her remedies in federal court, and the AAA should not accept this case for arbitration.

Sincerely,

A handwritten signature in black ink, appearing to read "JLH".

Jonathan L. Hilton, Esq.
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